DEFENDANT WELLS FARGO'S TIME TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT AND

It is hereby stipulated by and between Plaintiff Ginney Abeyta ("Ms. Abeyta"), through her attorney Michael Kind, and Defendant Wells Fargo Card Services ("Wells Fargo"), through

interest of conserving client and judicial resources, Ms. Abeyta and Wells Fargo stipulate and agree that Wells Fargo shall have until **February 29, 2016**, in which to file its responsive pleading. This is the parties' first request for an extension of time to respond to the First Amended Complaint and is not intended to cause any delay or prejudice to any party, but is

		Case 2:15-cv-02320-RCJ-NJK Document 23 Filed 01/25/16 Page 2 of 4		
1.L.P. ——————————————————————————————————	1 2	DATED this 20 th day of January, 2016.		
		KAZEROUNI LAW GROUP	SNELL & WILMER L.L.P.	
	3	By: <u>/s/ Michael Kind</u>	By: <u>/s/ Tanya N. Peters</u>	
	4	Michael Kind, Esq. Kazerouni Law Group, APC 7854 W. Sahara Avenue	Jeffrey L Willis (NV Bar No. 4797) Karl O. Riley (NV Bar No. 12077)	
	5	7854 W. Sahara Avenue Las Vegas, NV 89117 Telephone: (800) 400-6808x7	Tanya N. Peters (NV Bar No. 8855) 3883 Howard Hughes Parkway, Suite 1100	
	6	Telephone: (800) 400-6808x7 (signed with permission)	Las Vegas, NV 89169	
	7	Attorneys for Plaintiff	Telephone: (702) 784-5200 Facsimile: (702) 784-5252	
	8	Ginney Abeyta	Attorneys for Defendant Wells Fargo	
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ORDER IT IS ORDERED THAT Wells Fargo's time to respond to Plaintiff's First Amended Complaint shall be extended to on or before February 29, 2016. IT IS SO ORDERED. RT JUDGE DATED this 26th day of January, 2016. Respectfully submitted by: SNELL & WILMER L.L.P. /s/ Tanya N. Peters
Tanya N. Peters, Esq. 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 Telephone: (702) 784-5200 Attorneys for Defendant Wells Fargo Card Services

1	CERTIFICATE OF SERVICE			
2	I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen			
3	(18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be			
4	served a true and correct copy of the foregoing STIPULATION AND ORDER TO EXTEND			
5	DEFENDANT WELLS FARGO'S TIME TO RESPOND TO PLAINTIFF'S FIRST			
6	AMENDED COMPLAINT AND PROPOSED ORDER by the method indicated:			
7	U.S. Mail			
8	U.S. Certified Mail			
9	Facsimile Transmission			
10	Overnight Mail			
11	Federal Express			
12	Hand Delivery			
13	X Electronic Filing			
14 14 15 16 17 18 19 20 21 22 23 24 25 3	and addressed to the following: Danny J. Horen, Esq. Michael Kind, Esq. Kazerouni Law Group, APC 7854 W. Sahara Avenue Las Vegas, NV 89117 Telephone: (800) 400-6808x7 Facsimile: (800) 520-5523 danny@kazig.com David H. Krieger, Esq. HANES & KRIEGER, LLC 8985 S. Eastern Ave, Ste 370 Henderson, NV 89123 Telephone: (702) 880-5554 Facsimile: (702) 385-5518 dkrieger@hainesandkrieger.com			
25	DATED January 20, 2016.			
26	/s/ Nissa Riley An Employee of Snell & Wilmer LLP			
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